

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

|  |   |                     |
|--|---|---------------------|
| In the Matter of                         | ) |                     |
|  | ) |                     |
| Advanced Methods to Target and Eliminate | ) | CG Docket No. 17-59 |
| Unlawful Robocalls                       | ) |                     |
|  | ) |                     |
| Call Authentication Trust Anchor         | ) | WC Docket No. 17-97 |

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**COMMENTS OF AT&T**

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AT&T Services, Inc.<sup>1</sup> hereby submits these comments in response to the Consumer and Governmental Affairs Bureau’s public notice seeking input for the first staff report on call blocking.<sup>2</sup> As an industry leader in the provision of innovative call blocking and labeling programs and a champion of the Commission’s efforts in this area, AT&T is well positioned to shed light on the issues identified in the Public Notice. In fact, AT&T provided such input to assist in the development of the report on robocalling issued in consultation with the Federal Trade Commission’s Bureau of Consumer Protection,<sup>3</sup> and some of the initiatives AT&T described in that context have since been highlighted by the Commission and Commission staff.<sup>4</sup>

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<sup>1</sup> AT&T Services, Inc. is filing these comments on behalf of AT&T Mobility and its wireline operating affiliates (collectively, “AT&T” or the “Company”).

<sup>2</sup> Public Notice, FCC, *Consumer and Governmental Affairs Bureau Seeks Input for Report on Call Blocking*, CG Docket No. 17-59, WC Docket No. 17-97, DA 19-1312 (rel. Dec. 20, 2019) (“Public Notice”); *see also* Public Notice, FCC, *Consumer and Governmental Affairs Bureau Announces Comment Dates for First Staff Report on Call Blocking*, CG Docket No. 17-59, WC Docket No. 17-97, DA 19-1335 (rel. Dec. 30, 2019).

<sup>3</sup> *See generally* Comments of AT&T, CG Docket No. 17-59 (filed July 20, 2018) (“AT&T July 20, 2018 Comments”); Comments of AT&T, CG Docket No. 17-59 (filed Sept. 24, 2018) (AT&T Sept. 24, 2018 Comments”).

<sup>4</sup> *See, e.g., Advanced Methods to Target and Eliminate Unlawful Robocalls*, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, 34 FCC Rcd 4876 ¶ 26 (2019); *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Report on Robocalls, at ¶¶ 15 n.31, 19 (CGB 2019).

AT&T has continued to refine and expand its efforts in the area of call blocking and labeling, taking advantage of the flexible regulatory environment that the Commission has fostered through its clarifying rulings and other actions. AT&T thus welcomes this opportunity to update the Commission on its efforts in this area and provide its perspective on the important issues raised in the Public Notice.<sup>5</sup>

## **DISCUSSION**

### **I. AT&T OFFERS CUSTOMERS A VARIETY OF INNOVATIVE TOOLS TO FACILITATE CALL BLOCKING AND LABELING**

The Public Notice seeks information about the current availability of call blocking tools, including whether such tools are offered on an opt-out or opt-in basis, come in “multiple versions,” operate at the network or device level, and are available at no charge or for a fee.<sup>6</sup> In AT&T’s case, the answer is “all of the above.” Over the years, AT&T has developed a series of complementary call blocking options to ensure that customers across its voice platforms—post-paid mobile wireless, interconnected VoIP, and legacy telephone services—have a well-equipped “toolbox” to fight the scourge of illegal and unwanted calls.<sup>7</sup> Although aspects of these programs have been well documented in Commission dockets already, AT&T reiterates some of the historical detail here to establish a context for understanding its more recent efforts.

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<sup>5</sup> AT&T will separately respond to a recent letter from Chief of the Consumer and Governmental Affairs Bureau seeking information on several of the topics raised in the Public Notice. *See* Letter from G. Patrick Webre, Chief, Consumer and Governmental Affairs Bureau, FCC, to Randall L. Stephenson, CEO and Chairman, AT&T Inc. (Jan. 23, 2020).

<sup>6</sup> Public Notice at 2.

<sup>7</sup> AT&T Blog Team, *We Need a Whole Toolbox To Stop Robocalls*, AT&T Global Public Policy Blog (Mar. 22, 2018), <https://www.attpublicpolicy.com/consumers/we-need-a-whole-toolbox-to-stop-robocalls/> (“Whole Toolbox Blogpost”).

***AT&T Call Protect.*** In 2016, AT&T became the first voice provider to offer a branded, in-network call blocking and labeling tool at no charge to customers. Known then and now as “AT&T Call Protect” or “AT&T Call Protect Basic,” it is the centerpiece of AT&T’s call blocking toolbox.<sup>8</sup> Over time, AT&T Call Protect has evolved into a full suite of services that automatically blocks fraud calls and labels calls from numbers believed to be associated with suspect or potentially unwanted sources, including telemarketer, suspected spam, and other categories of calls. The service works across AT&T’s nationwide post-paid wireless network, on any eligible iOS or Android smartphone, whenever the subscriber is located in an HD Voice coverage area. Since launching the service, AT&T has blocked or labeled nearly 1.3 billion suspected fraud calls and more than 3 billion other suspect calls through AT&T Call Protect, including AT&T Call Protect Plus, discussed below. AT&T also offers the AT&T Call Protect companion application, which allows subscribers to access additional features of the AT&T Call Protect service, such as a personal block list. However, downloading or activating the AT&T Call Protect app is not required to activate the AT&T Call Protect service.<sup>9</sup>

Just last year, AT&T led the way for industry again when it immediately seized the opportunity provided by the Commission’s June 2019 declaratory ruling and began to implement AT&T Call Protect on an opt-out basis for its post-paid mobile wireless customers.<sup>10</sup> AT&T

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<sup>8</sup> See AT&T, AT&T Call Protect, [https://www.att.com/support/topic/wireless/topic\\_featuresettings-topic\\_callprotect-topic\\_attcallprotect](https://www.att.com/support/topic/wireless/topic_featuresettings-topic_callprotect-topic_attcallprotect) (last visited Jan. 24, 2020). AT&T Call Protect is available for consumer and business postpaid wireless accounts with eligible service.

<sup>9</sup> Press Release, AT&T, *AT&T Call Protect Expands Service*, July 9, 2019, [https://about.att.com/story/2019/att\\_call\\_protect.html](https://about.att.com/story/2019/att_call_protect.html) (explaining that AT&T will expand the service to millions of existing customers automatically).

<sup>10</sup> See Letter from Joan Marsh, Executive Vice President, Regulatory & State External Affairs, AT&T Communications, to the Hon. Geoffrey Starks, Commissioner, July 10, 2019, *attached to* Letter from Amanda Potter, Assistant Vice President and Senior Legal Counsel, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 17-59, WC Docket No. 17-97 (July 10, 2019); *see also* Public Notice at 2-3 (asking

initially offered this opt-out service to new AT&T Mobility customers and is in the process of automatically adding AT&T Call Protect to the accounts of millions of existing AT&T customers, again at no charge.<sup>11</sup>

AT&T has sought to make the transition to this opt-out model as convenient as possible for customers. To ensure that customers are informed about their services, AT&T notifies them by text message when the service is added so they are aware that certain calls will be blocked.<sup>12</sup> Although AT&T Call Protect is now provisioned for most AT&T Mobility customers, those remaining customers who want to start blocking calls immediately may activate the service either in the customer's account settings in myAT&T or by downloading the AT&T Call Protect app.<sup>13</sup> Customers may readily opt out of the service through their account settings as well, simply by signing into myAT&T and selecting "Opt out of Mobile Security & Call Protect."<sup>14</sup>

***AT&T Call Protect Plus.*** Although AT&T Call Protect offers substantial options and protection, AT&T has long sought to provide customers with multiple complementary tools. Since 2018, AT&T also has given its Mobility customers with eligible iOS and Android devices the option to subscribe to AT&T Call Protect "Plus," for a charge of \$3.99 per month.<sup>15</sup> AT&T

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how voice service providers responded to Commission actions such as its ruling clarifying that opt-out call blocking is permissible).

<sup>11</sup> Press Release, AT&T, *AT&T Call Protect Expands Service*, July 9, 2019, [https://about.att.com/story/2019/att\\_call\\_protect.html](https://about.att.com/story/2019/att_call_protect.html).

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> AT&T, *AT&T Call Protect FAQ*, <https://www.att.com/features/security-apps.html#faq> (last visited Jan. 24, 2020); AT&T, *Add AT&T Mobile Security & Call Protect: Downgrade, deactivate, or uninstall the apps*, <https://www.att.com/support/article/wireless/KM1220427> (last visited Jan. 24, 2020) (explaining the step-by-step process for opting out of AT&T Call Protect).

<sup>15</sup> See AT&T, *Get AT&T Call Protect Plus*, <https://www.att.com/esupport/article.html#!/wireless/KM1252905> (last visited Jan. 24, 2020). For

Call Protect Plus offers additional features, including enhanced caller ID and reverse number lookup, among others, as well as all of the benefits of the traditional AT&T Call Protect service.<sup>16</sup> AT&T Call Protect Plus users also have the option to identify entire categories of calls (e.g., political or survey calls) that they wish to block or send to voicemail (or accept) through the custom call blocking feature. Over time, AT&T has progressively moved features of its paid AT&T Call Protect Plus to the free AT&T Call Protect Basic option. For example, and as discussed in more detail below, previously only AT&T Call Protect Plus subscribers could automatically block suspected spam calls and automatically send unknown calls to voicemail.<sup>17</sup> Now, this feature is available to all AT&T Call Protect users.

***Digital Phone Call Protect.*** In November 2017, AT&T expanded AT&T Call Protect to customers of AT&T Home Phone, which is AT&T’s consumer VoIP service.<sup>18</sup> Digital Phone Call Protect is an opt-in service, offered at no additional charge to customers, that automatically blocks calls from known scammers, and sends customers a caller ID alert if a call is suspected to originate from one of several categories of potentially unwanted sources. Since launching Digital Phone, AT&T has blocked more than 46 million incoming calls and provided 36 million spam warnings for Digital Phone Call Protect subscribers.

***AT&T Smart Call Blocker Phones.*** Since 2017, AT&T has sold an AT&T-branded phone with call blocking capabilities. AT&T Smart Call Blocker phones work with *any* landline

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Android users, AT&T Call Protect Plus is offered together with the protection of the AT&T Mobile Security service.

<sup>16</sup> *Id.*

<sup>17</sup> Press Release, AT&T, *New Call Protect Features*, Oct. 31, 2019, [https://about.att.com/story/2019/call\\_protect\\_features.html](https://about.att.com/story/2019/call_protect_features.html) (“Press Release, *New Call Protect Features*”).

<sup>18</sup> See Press Release, AT&T, *Protecting You From Unwanted Calls*, Nov. 29, 2017, [http://about.att.com/newsroom/unwanted\\_calls.html](http://about.att.com/newsroom/unwanted_calls.html).

voice service and on *all* wireline networks, including legacy TDM-based telephone service, for customers with a subscription to caller ID.<sup>19</sup> Currently, AT&T offers ten different models of AT&T Smart Call Blocker phones, ranging in price from \$69.95 to \$139.95 depending on their features.<sup>20</sup>

These devices automatically block robocalls from ever ringing through, and allow customers to permanently blacklist up to 1,000 names and numbers. The phone functions by screening incoming calls from telephone numbers not included on the customer's list of trusted telephone numbers. Any such caller receives an intercept message and is required either to press a key or to record their name before the call will be put through to the consumer. This intermediate step, among other benefits, has the effect of diverting callers who are not live persons. Such a screen helps to eliminate certain illegal robocalls using an artificial or pre-recorded voice.

***Recently Added Call Blocking Tools.*** As successful as these programs have been, AT&T has not been content to rest on prior efforts. Instead, AT&T works every day to identify new methods of protecting customers. For example, in October 2019, AT&T added new free-of-charge features to AT&T Call Protect Basic to make unwanted robocalls even easier for wireless customers to avoid: (1) calls identified as “Spam Risk” can now be blocked automatically for no charge, (2) calls from anyone not in a user's address book can be sent to voicemail automatically,<sup>21</sup> and (3) calls can be blocked using Siri shortcuts, such as “Hey Siri, block the

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<sup>19</sup> AT&T, *Smart call blocker*, <https://telephones.att.com/telephones/cordless-telephones/smart-call-blocker> (last visited Jan. 29, 2020).

<sup>20</sup> *Id.*

<sup>21</sup> Customers who want to “white list” a telephone number need only add the telephone number to the device's address book.



last call.”<sup>22</sup> Each of these features is available on an opt-in basis for customers of AT&T Call Protect, subject to applicable device limitations.

In addition, utilizing SHAKEN/STIR and other technologies, AT&T began offering Call Validation Displays to certain mobile and wireline customers last month.<sup>23</sup> Specifically, certain AT&T Mobility customers will see a green checkmark and the words “Valid Number” when an incoming call has been authenticated.<sup>24</sup> AT&T Home Phone customers who activate the feature will see “[V]” for valid number.<sup>25</sup> With these signals, customers will have greater confidence and control over the calls they answer. As SHAKEN/STIR is more broadly deployed, these types of labels will be even more useful to customers, especially when used in conjunction with other tools to address illegal and unwanted calls. Indeed, initial customer surveys and consumer lab simulations conducted by AT&T of its SHAKEN/STIR customer displays estimate that call answer rates and trust levels increase by 16 to 26 percent, depending on the type of call, and showed no negative effects on non-marked calls.

## **II. AT&T SUPPLEMENTS ITS CUSTOMER-FACING TECHNIQUES WITH ITS OWN MULTI-FACETED EFFORTS TO MEET THE OBJECTIVE OF PROTECTING CUSTOMERS FROM ILLEGAL AND UNWANTED CALLS**

AT&T recognizes that customer-facing options alone are insufficient to mitigate the ever-evolving problems associated with illegal and unwanted calls.<sup>26</sup> AT&T thus invests heavily

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<sup>22</sup> Press Release, *New Call Protect Features*.

<sup>23</sup> Press Release, AT&T, *AT&T Activates Call Validation Displays*, Dec. 18, 2019, [https://about.att.com/story/2019/call\\_validation\\_displays.html](https://about.att.com/story/2019/call_validation_displays.html).

<sup>24</sup> *Id.* AT&T selected the “Valid Number” label after testing eleven different label options. AT&T’s testing indicated that “Valid Number” conveyed the most accurate information to consumers, and with less chance of consumer confusion or misinterpretation.

<sup>25</sup> *Id.*

<sup>26</sup> *See, e.g.*, Comments of AT&T, CG Docket No. 17-59, WC Docket No. 17-97, at 9 (filed Aug. 23, 2019) (observing that there is “no silver bullet” to address the robocall problem); *Whole Toolbox*

in additional efforts, incurring substantial cost to ensure that its customers, at no charge, can remain as free as possible from such calls. In this respect, call blocking is not limited solely to the “call blocking tools offered to consumers,”<sup>27</sup> but also includes the additional provider-initiated practices designed to achieve similar goals or to enhance the value of the tools that customers may use.

***Provider-Initiated Network Blocking.*** Apart from the tools made available to customers, AT&T’s global fraud team utilizes a network-based analytics system to block traffic that it believes to be illegal based on calling patterns and other data—for instance, calls originating from unassigned numbers or invalid numbers, lines designated as “inbound-only” by the subscriber, and high-volume short-duration calling events originating from suspect telephone numbers, among other calls. Through its network blocking programs,<sup>28</sup> AT&T has blocked almost 6 billion such calls on its network since 2016. In addition, AT&T has a process to assign do-not-originate (“DNO”) markers to telephone numbers being spoofed—for example, when scammers spoofed the IRS’s inbound customer service number in an attempt to defraud consumers—and has implemented such DNO blocks on its network for many years to assist customers with spoofing and imposter scam issues.

As AT&T has described previously and at length,<sup>29</sup> AT&T leverages the expertise of its fraud investigators and network analytics teams to develop a suspected robocall report that is now a vital tool for the accurate detection of suspected illegal robocalls on its network. The

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Blogpost (stating that the “fight against illegal and unwanted robocalls requires voice service providers to employ multiple tools, and [that] AT&T is committed to using every tool available to us in this fight”).

<sup>27</sup> Public Notice at 2.

<sup>28</sup> See AT&T July 20, 2018 Comments at 9-10 (summarizing these programs).

<sup>29</sup> See, e.g., AT&T Sept. 24, 2018 Comments at 4-11.

report, which is updated on a virtually continuous basis, allows AT&T to compile information on telephone numbers used to place calls with suspicious characteristics and to then identify patterns indicative of illegal robocalls.

This identification of suspect traffic is only the first step. Each and every telephone number that AT&T blocks through its network blocking programs is the subject of a careful, labor-intensive investigation as a matter of quality control in order to eliminate false positives. For example, every suspect telephone number is dialed by a fraud investigator before a block is placed. Among other benefits, this process helps to ensure that AT&T does not inadvertently block an unsuspecting—and innocent—consumer or business. And when a blocked suspect robocall line calls AT&T’s Mobility, U-verse, Prepaid, or Cricket customers, the caller receives the following announcement: “Your access to this network is restricted. Please contact 1-888-212-6040 if you feel you have reached this recording in error.” The same message repeats in Spanish. AT&T estimates that the false positive rate for its global fraud program is orders of magnitude less than one percent.<sup>30</sup>

***Consumer Outreach and Education.*** Because the quality of the call blocking and labeling tools provided to customers inevitably will depend to some extent on an individual customer’s understanding and knowledge of them, AT&T engages in consumer education. For instance, AT&T’s website provides customers with easy access to consumer information and tips about identifying and avoiding unwanted calls, as well as information about AT&T’s call blocking and labeling tools. More specifically, AT&T’s “Cyber Aware Resources”<sup>31</sup> page

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<sup>30</sup> Public Notice at 2 (asking how call blocking tools define false positives).

<sup>31</sup> AT&T, *Cyber Aware*, <https://about.att.com/pages/cyberaware/resources/contact> (last visited Jan. 29, 2020).

includes alerts on recently identified scams and provides links to other important consumer resources, as well as instructions for reporting various types of fraud (including telephone call fraud). Likewise, AT&T’s “Fraud and Security Resources”<sup>32</sup> page includes tips for consumers to protect themselves against fraud. AT&T also issues consumer alerts when fraud events are identified.<sup>33</sup> Customers can contact the AT&T Global Fraud Office to address suspected fraud.<sup>34</sup> Relatedly, AT&T is taking steps to educate customers about activities relevant to its implementation of SHAKEN/STIR. In its rollout of Call Validation Displays, AT&T explained in customer-friendly language what a “valid number” display does and does not indicate.<sup>35</sup>

***Collaboration with Call Originators.*** In parallel with AT&T’s work to expand consumer tools and protect its customers from illegal and unwanted robocalls, AT&T has established an ongoing and constructive dialogue with call originators to understand and, where appropriate, address concerns they have raised. Some legitimate, law-abiding call originators have seen call answer rates decline as consumers increasingly use call blocking/labeling tools and/or simply no longer answer calls from unfamiliar telephone numbers. AT&T welcomes the efforts of call originators to provide feedback and identify problems that make call blocking/labeling services—including its own—more accurate. For instance, AT&T provides easy-to-use web

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<sup>32</sup> AT&T, *Fraud & security resources*, <https://www.att.com/help/fraud-and-security.html> (last visited Jan. 29, 2020).

<sup>33</sup> See, e.g., AT&T, *Customer Awareness – Current Awareness Alerts*, <https://www.att.com/att/fraud/en/> (last visited Jan. 24, 2020).

<sup>34</sup> Consumers can also forward suspicious emails to AT&T Internet Security.

<sup>35</sup> See Press Release, AT&T, *AT&T Activates Call Validation Displays*, Dec. 18, 2019, [https://about.att.com/story/2019/call\\_validation\\_displays.html](https://about.att.com/story/2019/call_validation_displays.html).

portals that allow businesses (as well as consumers) to inform and improve the analytics that drive the AT&T Call Protect suite of products.<sup>36</sup>

***Cooperation with Public Safety Entities.*** As a service provider both to consumers calling 911 and to Public Safety Answering Points (“PSAPs”) answering calls, AT&T shares the Commission’s commitment to ensuring that 911 services and public safety interests are protected from unlawful calls and not negatively impacted by any call blocking practices. Protecting these life-saving communications is non-negotiable. In situations in which AT&T is made aware of suspect calling events impacting a public safety line, AT&T’s global fraud team has leveraged its deep investigative and call blocking experience to mitigate, if not eliminate, the impact on the public safety entity.<sup>37</sup> This same experience, which is designed to minimize the potential for *any* negative impact on legitimate voice traffic, also helps to ensure that such traffic to, or from, emergency responders and other public safety entities flows unimpeded. Likewise, AT&T Call Protect is designed to minimize the potential for any negative impact on legitimate voice traffic, including to and from public safety telephone numbers. Although AT&T is not aware that its robocall mitigation tools and practices pose any concern for public safety, AT&T is committed to working with industry and the Commission to explore new and innovative ways to protect the telephone lines of public safety entities.

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<sup>36</sup> See <http://www.att.com/reviewmycalllabel> (last visited Jan. 29, 2020) (linking to AT&T’s partner Hiya “Submit a Request” portal). Digital Phone subscribers may also log into the uVerse Portal and then report a number as “Not Spam.”

<sup>37</sup> AT&T works closely with its PSAP partners to swiftly address calling events that mimic Telephone Denial of Service- (“TDOS”) style attacks.

## CONCLUSION

AT&T appreciates the Commission's continued attention to these important issues and looks forward to collaborating with staff and other stakeholders in this proceeding, including through its forthcoming responses to the recent information request from the Consumer and Governmental Affairs Bureau.

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